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*Attorneys for Defendant Joaquin O. Atalig*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

DONGBU INSURANCE COMPANY, LTD., ) CIVIL ACTION NO. CV 08-0002  
Plaintiff, )  
vs. ) PRE-DISCOVERY DISCLOSURE  
OKP (CNMI) CORPORATION AND ) STATEMENT OF DEFENDANT  
JOAQUIN Q. ATALIG, ) JOAQUIN Q. ATALIG AND REQUEST  
Defendants. ) FOR RECIPROCAL INITIAL  
DISCLOSURES

Defendant Joaquin Q. Atalig, by and through counsel, hereby submits his Pre-Discovery Disclosure Statement, pursuant to LR 16.2CJd and FED.R.Civ.P. 26(a), and hereby requests reciprocal initial disclosures. Mr. Atalig's initial disclosures are as follows:

A. The name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its

1 claims or defenses, unless solely for impeachment, identifying the subjects of the  
2 information.

3 1. Joaquin Q. Atalig—Songsong, Rota, MP 96951, telephone no. 532-0478, re  
4 damages to his properties in Ginalangan, Rota.

5 B. A copy of, or a description by category and location of, all documents, data  
6 compilations, and tangible things that are in the possession, custody, or control of the  
7 party and that the disclosing party may use to support its claims or defenses, unless  
8 solely for impeachment.

9 1. Dongbu Automobile Policy and Contractor's All Risk Policy.

10 C. A computation of any category of damages claimed by the disclosing party.

11 1. A computation of damages will be provided to the parties as soon as  
12 practicable.

13 D. Any insurance agreement(s) under which any person carrying on an insurance  
14 business may be liable to satisfy part or all of a judgment which may be entered in the  
15 action or to indemnify or reimburse for payments made to satisfy the judgment.

16 1. Mr. Atalig anticipates that Dongbu and/or OKP will provide a complete copy  
17 of all applicable policies.

18 Dated: April 24, 2008

19 Respectfully submitted,

20 O'CONNOR BERMAN DOTTS & BANES

21 /s/  
22 Michael W. Dotts, Esq. (F0150)  
23 Attorneys for Defendant Atalig

24 Dated: April 24, 2008

25 LAW OFFICES OF RAMON K. QUICHOCHO, LLC  
26 /s/  
27 Ramon K. Quichocho, Esq. (F0243)  
28 Attorney for Defendant Atalig